

Message

From: Langman, Michael [langman.michael@epa.gov]
Sent: 7/3/2018 5:23:23 PM
To: Williams, Brian (bwilliam@idem.IN.gov) [bwilliam@idem.IN.gov]; Jenny Acker (jlacker@idem.in.gov) [jlacker@idem.in.gov]
CC: Logan, Doug [DLogan@idem.IN.gov]; mstuckey@idem.in.gov; Danesh, Paymon [Danesh.Paymon@epa.gov]; Damico, Genevieve [damico.genevieve@epa.gov]
Subject: RE: Riverview Energy Corporation #147-39554-00065 - Draft Federal Rule Applicability

Hi all,

Thank you for sharing the draft federal rule applicability determination with us for our review.

We reviewed the draft federal rule applicability determination at the staff level. We have also forwarded applicability questions to the EPA headquarters refinery contacts to get their (informal) input. Given HQ staff availability and workload, it may take some time to get their input. For a formal determination, we suggest submitting a written applicability determination request with information that could be used to make a formal decision based on the specific factors for this permitting action.

We also suggest referring to ADI control number Z080005. This determination discusses the applicability of 40 CFR 60 Subpart Ja and 40 CFR 63 Subpart CC to a proposed integrated gasification combined cycle power plant and refinery in South Dakota. Although the proposed source does not appear to have been built, the determination may still be helpful in this case. You can find the applicability determination at https://cfpub.epa.gov/adi/index.cfm?fuseaction=home.dsp_show_file_contents&CFID=66086833&CFTOKEN=41763786&id=Z080005.

In general, we don't disagree with IDEM's proposed determination. We understand that the federal rule applicability determination, as well as the draft permit itself, is still a work in progress and we recognize that this portion of the TSD may change. These are not formal comments on the draft permit since there is no draft permit available for public review. Instead, these are only suggestions intended to help focus or provide stronger justification in the pending draft permit's TSD.

Please let either me or Paymon know if you have any questions or wish to discuss any suggestions further.

- 1.) We suggest reevaluating NSPS Subpart Ja applicability to the hydrogen plant (see draft federal rule applicability, page 5). Currently, the draft applicability determination considers the natural gas and fractionator overhead as a feed to the hydrogen plant and concludes that the feed is used to create a product as opposed to being combusted to generate heat. However, based on the process flow diagram for the Block 7000 hydrogen production plant, it appears that the steam reforming units use fuel gas from the Block 6000 fuel gas system as both a feedstock and a fuel. Further, the draft Block 7000 hydrogen unit operations emissions unit description describes the steam-hydrocarbon reformer as being fired with Block 2000 VCC off-gas and PSA tail gas supplemented by natural gas and process fuel gas. 40 CFR 60.100a(a) states that fuel gas combustion devices are an affected facility under NSPS Subpart Ja. 40 CFR 60.101a defines a fuel gas combustion device as any equipment used to combust fuel gas, where fuel gas is any gas generated at a petroleum refinery and which is combusted and includes natural gas when the natural gas is combined and combusted with any proportion of gas generated at a refinery. Since the steam reformers are described as combusting fuel gas, it would appear that the steam reformers would be considered a fuel gas combustion device and, as a result, would be subject to NSPS Subpart Ja. If there is more information to indicate that the steam reformers are not fuel gas combustion devices, we suggest including this as part of the applicability determination to further support the nonapplicability of NSPS Subpart Ja to the hydrogen plant.

- 2.) We suggest adding brief justification explaining why the coal dryer heater (EU-1007 in the application) and the drying loop blower (EU-1008) are not subject to NSPS Subpart Y (see draft federal rule applicability, pages 11-14). Both emissions units are shown in the Block 1000 coal handling process flow diagram, but neither emissions unit appears to be discussed in the contexts of NSPS Subpart Y. It appears that the coal dryer heater may be an indirect thermal dryer as described at 40 CFR 60.251(j). However, since the coal dryer heater is subject to NSPS Subpart Ja, the heater would not be part of the affected facility under NSPS Subpart Y. It is not clear whether the same justification applies for the drying loop blower, so we suggest evaluating NSPS applicability for the drying loop blower emissions unit.
- 3.) EU-2002 is identified as the treat gas heater. While NSPS Subpart Ja applicability is evaluated for the treat gas heater, it appears that applicability to other refinery NSPS and NESHAP requirements is not. We suggest discussing whether EU-2002 would be subject to 40 CFR 60 Subpart GGGa, 40 CFR 63 Subpart CC, and other refinery-related standards.
- 4.) We suggest evaluating the applicability of 40 CFR Part 61 Subparts J and V. It's likely that there is no affected source that would either be in benzene or VHAP service as defined in each standard. However, for completeness, we suggest determining whether either standard would apply.
- 5.) For each refinery-related NESHAP, such as 40 CFR 63 Subpart CC, we suggest providing further discussion explaining why the source would be subject to each requirement. 40 CFR 63.641 defines a petroleum refining process unit as a process unit used in an establishment primarily engaged in petroleum refining as defined in SIC 2911 and used primarily for producing transportation fuels such as diesel fuels, among other things. In particular, we would suggest providing justification showing that the proposed source is an establishment primarily engaged in petroleum refining as defined in SIC 2911.
- 6.) We have the following suggestions for several requirements.
 - 40 CFR 60 Subpart NNN. We suggest that the applicant specify which requirement under 40 CFR 60.662 would apply. Applicable monitoring requirements in 40 CFR 60.663 are dependent on the applicable standard.
 - 40 CFR 61 Subpart BB. We request that you verify that 40 CFR 61.305(i) is included in the permit. Currently, page 25 of the draft federal rule applicability states that 40 CFR 61.304(i) applies. 40 CFR 61.300(d) states that the applicable recordkeeping and reporting requirements are in 40 CFR 61.305(i).
 - 40 CFR 61 Subpart FF. We suggest verifying whether 40 CFR 61.342 applies. As these are general standards, there may be some requirements that would apply. If the exemption in 40 CFR 61.342(a) applies, then it should be included in the permit since there are specific requirements for calculating the total annual benzene waste quantity.
 - 40 CFR 63 Subpart CC. We suggest adding 40 CFR 63.670 and 63.671 to the permit. Several proposed requirements applicable to the flares, such as 40 CFR 63.640(n)(8)(viii), would require the source to meet 40 CFR 63.670 on or after January 30, 2019.
 - 40 CFR 63 Subpart UUU. We have several suggestions for this rule.
 - We suggest verifying whether 40 CFR 63.1563(d) is an applicable requirement. It appears that it would be applicable since 40 CFR 63.1568(a)(4) may apply.
 - We suggest verifying whether 40 CFR 63.1568(a)(2) - (4), (b), and (c) apply. It appears that each of these requirement would apply in addition to the requirement at 40 CFR 63.1568(a)(1). Note that if you determine any of these requirements apply, then you should also evaluate whether any of Tables 29-35 also apply as these are referenced in each requirement.
 - We also suggest verifying whether any of tables 40-44 should be included in the permit. These tables are referenced in 40 CFR 63.1572, 63.1574, 63.1575, 63.1577, all of which are proposed to be included in the permit.

Thanks,
Michael Langman

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From: Williams, Brian [mailto:BWilliam@idem.IN.gov]
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Mike,

Jenny requested I email you the draft federal rule applicability determinations on her behalf as she is on vacation until Thursday. Please review our evaluations and let IDEM know if you have any questions or comments.

Sincerely,



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IDEM values your feedback.

